

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

ERC CREDIT USA, a Wyoming Corporation,

Plaintiff,

v.

WOLF LAKE FINANCIAL L.L.C., an Indiana
limited liability company; WOLF LAKE
TERMINALS, INC., a Missouri corporation;
POST WAREHOUSE CORP., an Indiana
corporation; SLM PROPERTIES, LLC, an
Indiana limited liability company; TANCO
CLARK MARITIME, LLC, an Indiana limited
liability company; TANCO TERMINALS, INC.,
an Indiana corporation; and LONG-
MIDDENDORF WAREHOUSE CORP., an
Indiana corporation d/b/a Wolf Lake Industrial
Centre;

Defendants.

WOLF LAKE FINANCIAL L.L.C., an Indiana
limited liability company; WOLF LAKE
TERMINALS, INC., a Missouri corporation;
POST WAREHOUSE CORP., an Indiana
corporation; SLM PROPERTIES, LLC, an
Indiana limited liability company; TANCO
CLARK MARITIME, LLC, an Indiana limited
liability company; TANCO TERMINALS, INC.,
an Indiana corporation; and LONG-
MIDDENDORF WAREHOUSE CORP., an
Indiana corporation d/b/a Wolf Lake Industrial
Centre,

Counter-Plaintiffs.

v.

ERC CREDIT USA, a Wyoming Corporation,

Counter-Defendant.

Case No. 2:23-cv-00219-JTM-APR

**DEFENDANTS/COUNTER-PLAINTIFFS' VERIFIED MOTION AND AFFIDAVIT FOR
ENTRY OF DEFAULT AGAINST PLAINTIFF/COUNTER-DEFENDANT
ERC CREDIT USA, PURSUANT TO RULE 55(a)**

Defendants/Counter-Plaintiffs Wolf Lake Financial, LLC, Wolf Lake Terminals, Inc., Post Warehouse Corporation, SLM Properties, LLC, Tanco Clark Maritime, LLC, Tanco Terminals, Inc. and Long-Middendorf Corporation, by counsel David A. Buls of Krieg DeVault LLP, in support of entry of default state Plaintiff/Counter-Defendant, ERC Credit USA, a Wyoming corporation: (a) appeared by counsel on May 30, 2023; (b) subsequently caused counsel to withdraw without engaging replacement counsel; (c) has been without legal counsel since May 2, 2024; and, (d) has failed to pursue or defend this case as set forth in FRCP 55(a).

WHEREFORE, Defendants/Counter-Plaintiffs request the Clerk enter default against Plaintiff/Counter-Defendant, ERC Credit USA, a Wyoming Corporation.

The affiant affirms under penalties for perjury that the foregoing is true and correct to the best of his knowledge.

/s/ David A. Buls

David A. Buls

Respectfully submitted,

KRIEG DEVAULT LLP

/s/ David A. Buls

David A. Buls Atty. No. 17890-64

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Attorney for Defendants/Counter-Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 12, 2024, he electronically filed the foregoing document using the Indiana E-filing System (IEFS) and that it was served upon the following via U.S. Mail at the last known address for Plaintiff/Counter-Defendant:

ERC CREDIT USA
1712 Pioneer Avenue
Cheyenne, Wyoming 82001

/s/ David A. Buls